

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 22-cr-20349-SCOLA

UNITED STATES OF AMERICA

vs.

YVES RICHARD LARRIEUX,

Defendant.

/

FACTUAL PROFFER

Defendant, Yves Richard Larrieux (“defendant”), his counsel, and the United States agree that, had this case proceeded to trial, the United States would have proven the following facts beyond a reasonable doubt:

On or about July 30, 2022, the defendant entered the United States on a B1/B2 non-immigrant tourist visa. At all material times, defendant knew that he had entered the United States on a B1/B2 non-immigrant tourist visa. Knowing that he could not purchase ammunition without showing identification, defendant then gave another individual money and had that other individual purchase 7 boxes of 9mm Federal ammunition (containing a total of 350 rounds) for him at a gun store in the Fort Lauderdale area. Defendant loaded the seven boxes of ammunition into his roll-aboard suitcase.

*✓ However, the defendant believed he could travel with the ammunition.*  
Y.R.L  
Y.D -

On July 31, 2022, the Defendant checked his roll-aboard suitcase – containing the ammunition – onto an American Airlines flight to Haiti. United States Customs and Border Protection (“CBP”) Officers discovered the ammunition through an X-ray examination of the luggage. A hand search confirmed the presence of the ammunition in the roll-aboard suitcase with

American Airlines Tag# AA7001929505. CBP Officers encountered defendant on the jet-bridge boarding the flight to Haiti. The Defendant produced from this pocket the bag check ticket for Tag# AA7001929505. Defendant also admitted the bag was his, that he packed it, and knew it contained ammunition, and that he had someone buy the ammunition for him. Defendant also admitted that he did not have a valid hunting license issued in the United States. Defendant is not an official or law enforcement officer of a foreign government

The facts described above are not intended to be a complete recitation of the facts of this case and are merely intended to form a basis for the undersigned defendant's knowing, willful, and intentional plea of guilty.

JUAN ANTONIO GONZALEZ  
UNITED STATES ATTORNEY

Date: 8/15/22 By:

*Fay JH*  
HAYDEN P. O'BYRNE  
ASSISTANT UNITED STATES ATTORNEY

*Larry T. McMillan*  
LARRY T. MCMILLAN  
ATTORNEY FOR DEFENDANT

Date: 8/15/22

*Larrieux Yves Richard*  
YVES RICHARD LARRIEUX  
DEFENDANT